

From: North, Alexis  
Sent: Tuesday, March 06, 2018 09:28 PM  
To: Mia, Marcia  
Subject: FW: Inert Gas and Wells NSPS 0000a

What Scott said...

From: Patefield, Scott  
Sent: Monday, March 5, 2018 10:21 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Kler, Denis <Kler.Denis@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Basinger, David <Basinger.David@epa.gov>; Pavitt, John <Pavitt.John@epa.gov>; Keenan, John <keenan.john@epa.gov>  
Subject: RE: Inert Gas and Wells NSPS 0000a

Here is an excerpt from an email from FDL Operating we received in November 2016:

In the Salt Creek and Monell fields, CO2 flood fields in Wyoming, FDL Operating fracs/refracs wells for the purpose of stimulation, because of the 95% CO2 composition of produced gas (due to the injection of CO2 for the flood) associated with FDL wells, it isn't possible to flare without incorporating a tremendous amount of fuel gas which would lead to more emissions than if the original production were allowed to vent. In FDL's operations, the frac flowbacks extend for no more than 8 hours or until CO2 reaches surface, whichever comes first. The CO2 freezes at the pressure drop making it unproductive to attempt to flow back beyond that point and not feasible to operate a separator. I believe this should be classified as exempt under the initial flowback stage. Please give me your thoughts and guidance as to how to remain in compliance with Quad Oa with regard to FDL's unique situation.

Flowback fluid is routed straight to tanks at the wellhead and gas is emitted to atmosphere (95% CO2). Once flowback is over, oil is sent to a central processing facility where any gas produced is compressed and re-injected into the well.

From: Mia, Marcia  
Sent: Monday, March 5, 2018 9:24 AM

To: augustine, bruce <augustine.bruce@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Kler, Denis <Kler.Denis@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Basinger, David <Basinger.David@epa.gov>; Pavitt, John <Pavitt.John@epa.gov>; Keenan, John <keenan.john@epa.gov>  
Subject: Inert Gas and Wells NSPS 0000a

Importance: High

## Ex. 5 Deliberative Process (DP)

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Marcia B Mia, Acting Chief

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042